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Attorneys for Defendants Green United, LLC and Wright W. Thurston and Relief Defendants

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF UTAH, CENTRAL DIVISION**

SECURITIES AND EXCHANGE
COMMISSION,

Plaintiff,

v.

GREEN UNITED, LLC, et al.,

Defendants.

**REQUEST TO SUBMIT FOR ORAL
ARGUMENT REGARDING:**

**DEFENDANTS GREEN UNITED,
LLC, WRIGHT W. THURSTON, AND
RELIEF DEFENDANTS' MOTION TO
DISMISS PLAINTIFF'S COMPLAINT**

Case No. 2:23-cv-00159-BSJ

Judge Bruce S. Jenkins

Defendants Green United, LLC ("Green United") and Wright W. Thurston ("Thurston")
and Relief Defendants True North United Investments, LLC ("True North") and Block Brothers,

LLC (“Block Brothers”) (collectively, the “Relief Defendants”), through counsel of record, pursuant Federal Rule of Civil Procedure 7 and Local Rule DUCivR 7-3(b), hereby submit for decision their Motion to Dismiss Plaintiff Securities and Exchange Commission’s (“SEC”) Complaint. The following documents have been filed with the court:

1. Defendants Green United, Thurston and Relief Defendants filed their Motion to Dismiss and Memorandum in Support, including affidavit in support, on May 19, 2023 [Dkt. 23];
2. An Amicus Curiae brief in support of Defendants’ Motion to Dismiss was filed on June 6, 2023 [Dkt. 36];
3. Defendants Green United, Thurston and Relief Defendants filed a Notice of Supplemental Authority relating to their Motion to Dismiss on June 15, 2023 [Dkt. 37];
4. The SEC filed its Memorandum in Opposition to Defendants Green United, Thurston and Relief Defendants’ Motion to Dismiss on June 30, 2023 [Dkt. 38];
5. Defendants Green United, Thurston and Relief Defendants filed their Reply Memorandum in Support of their Motion to Dismiss, including affidavit in support, on July 28, 2023 [Dkt.43, Dkt. 44].
6. The SEC did not file an opposition or response to the Amicus Curiae brief or the Notice of Supplemental Authority.
7. Defendants Green United, Thurston and Relief Defendants have requested oral argument.

DATED this 28th day of July 2023.

PARSONS BEHLE AND LATIMER

/s/ Jonathan D. Bletzacker

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DAVIS WRIGHT TREMAINE, LLP

/s/ Stephen T. Gannon

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*Attorneys for Defendants Green United, LLC,
and Wright W. Thurston and Relief Defendants
True North United Investment, LLC and Block
Brothers, LLC*

CERTIFICATE OF SERVICE

On this 28th day of July 2023, I hereby certify that I electronically filed a true and correct copy of the foregoing with the Clerk of the Court using the CM/ECF system, which sent notification and service to all counsel of record.

/s/ Jonathan D. Bletzacker